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LAW OFFICES

## KELLER AND HECKMAN LLP

1001 G STREET, N.W.  
SUITE 500 WEST  
WASHINGTON, D.C. 20001  
TELEPHONE (202) 434-4100  
FACSIMILE (202) 434-4646

BOULEVARD LOUIS SCHMIDT 87  
B-1040 BRUSSELS  
TELEPHONE 32(2) 732 52 80  
FACSIMILE 32(2) 732 53 92

WWW.KHLAW.COM

JOSEPH E. KELLER (1907-1994)  
JEROME H. HECKMAN  
WILLIAM H. BORGHESE, JR.  
MALCOLM D. MACARTHUR  
WAYNE V. BLACK  
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BRIAN T. ASHBY  
ARTHUR S. GARRETT III  
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MARTHA E. MARRAPESE

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DEVON WM. HILL\*  
DANIEL QUINTART\*  
MICHAEL A. PETRUZZI\*  
DAVID C.M. LASHWAY\*  
TASHIR J. LEE\*

\*NOT ADMITTED IN D.C.  
\*RESIDENT BRUSSELS

## SCIENTIFIC STAFF

DANIEL S. DIXLER, PH. D.  
CHARLES V. BREDER, PH. D.  
ROBERT A. MATHEWS, PH. D., D.A.B.T.  
JOHN P. MODDERMAN, PH. D.  
HOLLY HUTMIRE FOLEY  
JANETTE HOUK, PH. D.  
LESTER BORODINSKY, PH. D.  
THOMAS C. BROWN\*  
MICHAEL T. FLOOD, PH. D.  
ANDREW P. JOVANOVIH, PH. D.  
ANNA GERGELY, PH. D.\*  
STEFANIE M. CORBITT

TELECOMMUNICATIONS  
ENGINEER  
RANDALL D. YOUNG

WRITER'S DIRECT ACCESS

January 2, 1998

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(202) 434-4284  
ashby@khlaw.com

JAN 2 - 1998

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION **VIA HAND DELIVERY**  
OFFICE OF THE SECRETARY

Re: Cellular Service and Other Commercial Mobile Radio Services in the Gulf of Mexico;  
WT Docket No. 97-112

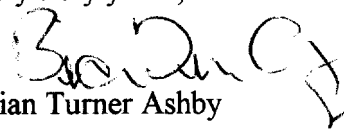
**EX PARTE PRESENTATION**

Dear Ms. Salas:

The purpose of this letter is to provide notice that on, January 2, 1998, Brian Ashby, a representative of Shell Offshore Services Company ("SOSCo"), hand delivered a written ex parte presentation to David Furth, Chief of the Commercial Wireless Division, concerning the above-captioned proceeding. A copy of the written presentation, as well as the attachment thereto, is enclosed.

Should there be any questions or a need for additional information, please communicate directly with SOSCo's undersigned telecommunications counsel.

Very truly yours,

  
Brian Turner Ashby

Enclosure

cc: Mr. David Furth  
Mr. Wilbert Nixon  
Ms. Linda Chang  
Myers Keller Communications Law Group

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LAW OFFICES  
**KELLER AND HECKMAN LLP**

1001 G STREET, N.W.  
SUITE 500 WEST  
WASHINGTON, D.C. 20001  
TELEPHONE (202) 434-4100  
FACSIMILE (202) 434-4646

—  
BOULEVARD LOUIS SCHMIDT 87  
B-1040 BRUSSELS  
TELEPHONE 32(2) 732 52 80  
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—  
WWW.KHLAW.COM

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TASHIR J. LEE\*

\*NOT ADMITTED IN D.C.  
\*\*RESIDENT BRUSSELS

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ANNA GERGELY, PH. D.\*  
STEFANIE M. CORBITT

TELECOMMUNICATIONS  
ENGINEER  
RANDALL D. YOUNG

—  
WRITER'S DIRECT ACCESS

(202) 434-4284  
ashby@khlaw.com

January 2, 1998

Mr. David Furth  
Chief, Commercial Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2100 M Street, N.W.  
Seventh Floor, Room 23  
Washington, D.C. 20554

**VIA HAND DELIVERY**

Re: Cellular Service and Other Commercial Mobile Radio Services in the Gulf of  
Mexico; WT Docket No. 97-112  
**EX PARTE PRESENTATION**

Dear Mr. Furth:

On behalf of Shell Offshore Services Company ("SOSCo"), this is a follow up to our ex parte meeting on November 12, 1997, regarding the above-captioned proceeding. As you will recall, during the meeting we urged the Federal Communications Commission ("Commission") to license most non-cellular Commercial Mobile Radio Service ("CMRS") spectrum in the Gulf of Mexico ("GOM"), especially Specialized Mobile Radio ("SMR") service spectrum, and explained SOSCo's intent to pursue short-term, secondary authority to operate an SMR system in the GOM. A copy of the ex parte notice filed with the Commission by us at the conclusion of the meeting, including the "talk sheet" distributed by us during the meeting, is attached for your convenience.

At the conclusion of the meeting, you asked that SOSCo file an application that describes the short-term, secondary SMR authority it wants in the GOM. Before filing such an application, however, SOSCo has decided to take a number of preliminary steps that hopefully will eliminate, or at least ameliorate, some of the concerns the Commission and SMR licensees in the GOM area may have with the application. In particular, SOSCo has entered into discussions that are intended to establish procedures for monitoring and resolving interference disputes between land-based SMR licensees and water-based licensees. If possible, SOSCo also intends to use the

Mr. David Furth  
January 2, 1998  
Page 2

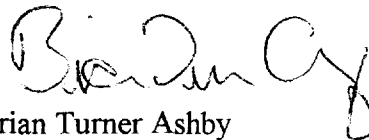
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discussions to develop mutually agreeable interference protection criteria for use between land-based and water-based licensees, establish roaming agreements with other licensees, and address any other concerns raised by these licensees.

Once these discussions are completed, perhaps in the next few months, SOSCo will file the requested application. The application will specify which channels it needs, the geographic area in which it intends to use the channels, and all other necessary technical information. To the extent relevant, SOSCo also will describe the results of its discussions with the SMR licensees in the GOM area.

We trust you will find this letter self-explanatory. Should you or others at the Commission have any questions or require additional information, however, please do not hesitate to contact the undersigned telecommunications counsel for SOSCo.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Turner Ashby", written in a cursive style.

Brian Turner Ashby

Enclosure

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B-1040 BRUSSELS  
TELEPHONE 32(2) 732 52 80  
FACSIMILE 32(2) 732 53 92

WWW.KHLAW.COM

JOSEPH E. KELLER 11907-119941  
JEROME H. HECKMAN  
WILLIAM N. BORGESANI, JR.  
MALCOLM D. MACARTHUR  
WAYNE V. BLACK  
TERRENCE D. JONES  
MARTIN W. BERCOVICI  
JOHN S. ELDRED  
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MICHAEL T. FLOOD, Ph. D.  
ANDREW P. JOVANOVIK, Ph. D.  
ANNA GERGELY, Ph. D.\*  
STEFANIE M. CORBITT

TELECOMMUNICATIONS  
ENGINEER  
RANDALL D. YOUNG

WRITER'S DIRECT ACCESS

November 12, 1997

(202) 434-4284  
ashby@khlaw.com

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

VIA HAND DELIVERY

Re: WT Docket No. 97-112; Cellular Service and Other Commercial Mobile Radio  
Services in the Gulf of Mexico  
EX PARTE MEETING

Dear Mr. Caton:

The purpose of this letter is to provide notice that, on November 12, 1997, Jack Richards and Brian Ashby, representatives of Shell Offshore Services Company ("SOSCo"), met with David Furth, Chief of the Commercial Wireless Division, to discuss the above-captioned proceeding. Wilbert Nixon and Linda Chang, attorneys in the Auctions Division, also were present at the meeting.

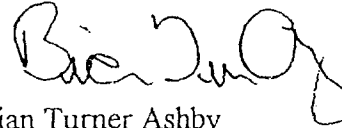
The discussion concerned the Federal Communications Commission's ("Commission's") proposal to license non-cellular Commercial Mobile Radio Service ("CMRS") spectrum in the Gulf of Mexico. As representatives of SOSCo, a telecommunications service provider active in the Gulf of Mexico and an affiliate of the largest petroleum and natural gas producer in the Gulf of Mexico, we expressed our belief that the Commission should license all non-cellular CMRS spectrum, except Personal Communications Service spectrum, in the Gulf of Mexico. A copy of the "talk sheet" used in the meeting, which summarizes SOSCo's position vis-a-vis the proceeding, is attached.

William F. Caton  
November 12, 1997  
Page 2

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Should further information be required, the Commission is respectfully requested to contact the undersigned.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Brian Turner Ashby".

Brian Turner Ashby

Enclosure

**SHELL OFFSHORE SERVICES COMPANY**  
**LICENSING OF NON-CELLULAR CMRS SPECTRUM IN THE GULF OF MEXICO**  
**WT DOCKET NO. 97-112**

- Petroleum and natural gas exploration and production activity in the GOM has increased dramatically in recent years. Experts now predict that the GOM will become the largest oil and natural gas frontier in the U.S. This oil and natural gas is critical to the nation's economy and will decrease dependence on foreign sources.
- The increased activity in the GOM has led to an increase in demand for many types of telecommunications services. The demand for CMRS services, especially SMR services, is particularly acute. The record established in this proceeding documents this demand.
- Telecommunications service providers in the GOM, however, are having difficulty meeting demand in the GOM. There is a dearth of spectrum available because the GOM has not been included in recent spectrum auctions. For instance, it currently is not possible to obtain 800 MHz or 900 MHz SMR licenses in the GOM.
- The Commission should remedy this situation by licensing all non-cellular CMRS spectrum, except PCS spectrum, in the GOM. The licenses for this spectrum should authorize operation throughout the entire GOM, from the beach out to the limits of U.S. jurisdiction.
- The Commission should reject the self-serving arguments of existing land-based and water-based CMRS licensees opposed to the licensing of non-cellular CMRS spectrum in the GOM:
  - Land-based non-cellular CMRS licensees are not authorized to serve the GOM and, if given the authority to do so, will not provide adequate service. At most, these licensees would serve only the coastal portions of the GOM covered by their land-based transmitters. The overwhelming majority of the platforms in the GOM are located well outside this area.
  - There is no credible evidence that land-based non-cellular CMRS licensees will receive interference from water-based licensees because there are no water-based licensees operating in the GOM. Moreover, SOSCo is willing to work with the Commission and land-based licensees to establish workable interference criteria for the GOM.
- While the Commission considers whether to license non-cellular CMRS spectrum in the GOM, SOSCo would like short-term, secondary authority to operate a 20 channel 800 MHz SMR system in the GOM. Operation of this SMR system would clarify whether interference is likely between water-based and land-based SMR providers and could be used to develop workable interference criteria for the GOM.